



{In Archive} Cayuga Site: Amendment 6 workplan by GE/OBG

David A Eckhardt

to:

Isabel Rodrigues

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Cc:

kjkelly, Kevin Lynch, Robert Alvey, "Joe Mayo", "Klerides, Demetrios", " John Dougherty", John H Williams

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Isabel,

I have two main concerns about the Amendment 6 workplan recently proposed by GE/OBG:

1. The power-line corridor that interfered with the first Willowstick survey runs directly through the middle of the new survey area in a southwest-northeast direction, and the problem of short-circuited Willowstick signal will likely again be present. The Manlius (I1-I2) confining unit does not appear to be present at EPA-9, where the vertical profile in water levels has always been hydrostatic. Thus, the Willowstick signal may short upwards to ground at the power line directly adjacent to EPA-9. In the first survey, the results were severely compromised by this surface-grounding effect, even though the modelers were able to trace some apparent D3 flow paths in areas unaffected by the grounding. I suspect that the same problem will be inherent with the currently proposed survey, in which case the line 2 wells will be blindly sited as drawn in the workplan figure 1. If this happens, then the phase 2 contingency wells along line 3 may not happen.

Despite this problem, I support the workplan because it may provide additional monitoring wells that may ultimately be used to evaluate the effectiveness of any remedial action at Powerex. But the new wells may not be effectively sited due to the limitations stated above. My real concern, however, is that this workplan mainly addresses GE's situation with the homeowner tort suits to the south, and it does

little to advance the EPA position on the need for a timely remedial plan for the deep-aquifer contamination at the Powerex facility. It may also further delay the Federal plan to collect a comprehensive set of water levels and samples, which was originally scheduled for last November.

2. The borehole logs and water-quality results from the Amendment 5 wells drilled and sampled in 2009 clearly show that preferential pathways of groundwater flow and contaminant transport at the Site have allowed significant contaminant levels to move beyond line 1. At the last meeting we had in Troy, it was decided to drill these wells (with Willowstick technology) to show the effectiveness of the GE position that bioremediation at the site was more than 99 percent successful north of line 1. It is now clear, as the Federal position has stated all along, that preferential flow that is concentrated in solution cavities in the deep (D3-Bertie) aquifer has allowed contaminant transport to bypass much of the bio-attenuation capacity offsite of Powerex. These results indicate the immediate need to develop a remedial plan for source control, which is not addressed in the current workplan proposal.

—Dave

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